

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ALEXANDER STYLLER, INTEGRATED
COMMUNICATIONS & TECHNOLOGIES,
INC., JADE CHENG, JASON YUYI, CATHY
YU, CAROLINE MARAFAO CHENG,
PUSHUN CHENG, CHANGZHEN NI,
JUNFANG YU, MEIXIANG CHENG,
FANGSHOU YU, and CHANGHUA NI,

Plaintiffs,

vs.

HEWLETT-PACKARD FINANCIAL
SERVICES COMPANY, HEWLETT-
PACKARD FINANCIAL SERVICES (INDIA)
PRIVATE LIMITED, HP INC., HEWLETT
PACKARD ENTERPRISE COMPANY, and
DAVID GILL

Defendants.

Civil Action No. 1:16-CV-10386 (LTS)

JOINT REPORT

WHEREAS, the Court issued an order on November 15, 2019 [ECF 280] (the “Order”), *inter alia*, setting deadlines for Plaintiffs’ expert report “regarding whether the goods at issue in this case were counterfeit,” Defendants’ expert report, expert depositions, and Defendants’ motion for partial summary judgment (if any) on this issue;

WHEREAS, the Order also required the parties to submit a Joint Report setting forth their “joint or separate positions for a schedule to govern the remainder of the litigation and whether any of that may occur prior to the Court’s ruling on summary judgment”;

THE PARTIES HEREBY submit the Joint Report ordered by the Court:

Joint Scheduling Proposal

1. Fact witness depositions to commence following adjudication of the motion for partial summary judgment and to be completed within 6 months thereafter;
2. Depositions to be conducted in the U.S. and human Plaintiffs' depositions to be coordinated with their submission to medical/psychological examinations by suitably licensed or certified examiners upon Defendants' motion pursuant to Rule 35 that "shall specify the time, place, manner, conditions, and scope of the examination and the person or persons by whom it is to be made," or as agreed by the parties. The parties further reserve their rights to move for a protective order pursuant to Rule 26(c) with respect to depositions and/or medical/psychological examinations.
3. Plaintiffs to supplement Interrogatory Response 21(a)&(b) concerning experts within 6 months of adjudication of the motion for partial summary judgment;
4. Parties to serve Requests for Admission within 30 days of close of fact witness depositions; Responses due 30 days thereafter;
5. Plaintiffs' treating physicians and Defendants' medical professionals who conduct examinations of Plaintiffs (to the extent they are not designated as experts by Defendants) shall be deposed within 1 month of close of fact witness depositions;
6. Plaintiffs shall serve expert reports and supplement Interrogatory Response 21(c) and Document Requests 56-59 within 6 weeks of close of fact witness depositions;
7. Defendants shall serve expert reports within 6 weeks thereafter;
8. Plaintiffs shall serve rebuttal expert reports within 3 weeks thereafter;
9. Expert witnesses shall be deposed within 1 month thereafter;
10. Motion(s) for summary judgment shall be filed within 1 month of close of expert witness depositions.

In accordance with the above, the parties jointly believe that the motion for partial summary judgment, if any, concerning the issue of whether the goods at issue in this case were counterfeit, should precede the above proposed case deadlines and should not run concurrently.

CONCLUSION

The parties respectfully submit this Joint Report concerning the remaining case schedule.

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CERTIFICATE OF SERVICE

I, Christina T. Lau, Attorney for Defendants Hewlett-Packard Financial Services Company, Hewlett-Packard Financial Services (India) Private Limited, HP Inc., Hewlett Packard Enterprise Company, and David Gill, hereby certify that the foregoing Joint Report was filed using the CM/ECF system and electronic notice will be sent to registered participants as indicated on the Notice of Electronic Filing (NEF) on November 27, 2019.

/s/ Christina T. Lau
Christina T. Lau